

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

1. Jesus VALDEZ (2000/USC)
2. Jonathan ROMERO (2001/USC)
3. Darrell PALOMAREZ (2000/USC)
4. Rodrigo ACEVEDO (1999/MX)
5. Abel CAVAZOS (1979/USC)

Defendant(s)

Case No. M-20-2688-M

United States Courts
Southern District of Texas
FILED

December 04, 2020

CRIMINAL COMPLAINT

David J. Bradley, Clerk of Court

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 3, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC § 1324(a)(1)(A)(iii)

Offense Description

Knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, or attempts to conceal, harbor, or shield from detection, such alien in any place, including any building or any means of transportation

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Jongwoo
Chung

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:

Date: Dec. 4, 2020 at 8:19 a.m.

City and state: McAllen, Texas

/s/ David T. Racca*Complainant's signature*David T. Racca, HSI Special Agent*Printed name and title*


Judge's signature

U.S. Magistrate Judge Juan F. Alanis*Printed name and title*

ATTACHMENT A

On December 3, 2020, Homeland Security Investigations (HSI) Special Agents, received information regarding an alien smuggling event from U.S. Border Patrol agents (BPAs). At approximately 7:50am, HSI received a call from BPAs from the Weslaco Border Patrol Station, Weslaco, Texas, with information from material witness #1 identifying a possible undocumented alien (UDA) stash house located in Donna, Texas. BPAs and HSI SAs responded to the address and encountered Abel CAVAZOS. BPA made contact with CAVAZOS and CAVAZOS denied consent to enter the property. Shortly after, BPAs observed several subjects fleeing a structure on the property in a northbound direction. Upon apprehension, some of the subjects admitted to being illegally present without proper documentation to be in or remain in the United States. BPAs observed additional subjects fleeing on the property. CAVAZOS was again encountered and gave consent for BPAs and HSI SAs to enter the property.

A subsequent search of the property resulted in an apprehension of a total of twenty individuals, thirteen admitting to being illegally present without proper documentation to be in or remain in the United States. Through investigative means, HSI McAllen identified the following individuals as principals in the event and took the following statements;

Jesus VALDEZ admitted during a post-miranda interview that he was responsible for finding the location to stash the UDAs, drove the UDAs to the property, and was responsible for their well-being. VALDEZ identified Jonathan ROMERO and Darrell PALOMAREZ as being assigned caretaking duties (providing food, water, and medicine) of the UDAs at the property.

Jonathan ROMERO admitted during a post-miranda interview that he was responsible for helping the caretakers feed and provide water to the UDAs. ROMERO identified Darrell PALOMAREZ and Rodrigo ACEVEDO as the caretakers of the UDAs at the property. ROMERO identified Jesus VALDEZ as being in charge at the property where the UDAs were held.

Darrell PALOMAREZ admitted during a post-miranda interview that he was responsible for the well-being of the UDAs on the property. PALOMAREZ identified Jesus VALDEZ and Jonathan ROMERO as being in charge of the property where the UDAs were held. PALOMAREZ also identified Rodrigo ACEVEDO as a caretaker of the UDAs.

Rodrigo ACEVEDO admitted during a post-miranda interview that he had knowledge of people being kept on the property, and identified Abel CAVAZOS as being the owner of the house on the property before invoking miranda rights.

Material witness #1 identified Darrell PALOMAREZ by way of six-person photo lineup as a member of the smuggling organization.

HSI McAllen developed three additional material witness through investigative means who provided the following information;

Material witness #2 identified the following individuals as being members of the smuggling organization by way of six-person photo lineup; Darrell PALOMAREZ, Rodrigo ACEVEDO and Jonathan ROMERO. Material witness #2 identified Abel CAVAZOS as having made phone calls to the UDAs family members asking for money and physically assaulting the UDAs.

Material witness #3 identified the following individuals as being members of the smuggling organization by way of six-person photo lineup; Darrell PALOMAREZ, Jesus VALDEZ, Jonathan ROMERO and Rodrigo ACEVEDO. Material witness #3 also identified Abel CAVAZOS as the property owner, carrying a firearm around the UDAs, and referred to as "boss" by the others in the smuggling organization.

Material witness #4 identified Jesus VALDEZ by way of six-person photo lineup as a member of the smuggling organization.